REMARKS

Claims 1-6, 8, 10-12, 14, 17-29 and 31-42 were pending and presented for examination in this application. In the latest Office Action, all pending claims were rejected. With this amendment, claims 1, 3-6, 8, 10-12, 14, 18-25, 29, 31, 33 and 35-39, are amended. These amendments were made to clarify the language of the invention and, Applicants respectfully submit, do not narrow the scope of the invention over which Applicants claim protection. On the basis of the following remarks, Applicants respectfully request reconsideration of this application and the allowance of all pending claims.

In the latest Office Action, Examiner rejected claims 1-6, 8, 10-12, 14, 17, 22-27, 29, and 31-42 under 35 U.S.C. § 103(a) as being unpatentable over US Patent No. 6,452,498 ("Stewart") in view of US Patent No. 6,526,275 ("Calvert") and further in view of US Patent No. 6,606,323 ("Ramamurthy"). Applicants respectfully submit that the claims, as amended, are patentable over the cited references, alone or in combination.

Claim 1, as amended, recites a system for delivering location-based services to mobile clients that includes location-aware service proxies that can deliver information based on a requesting client's location. More specifically, the claim recites:

> wherein at least one of the location-aware service proxies is configured to:
> receive a DNS request specifying a host name from a mobile client,
> determine if the requested host name corresponds to a location-based service, and responsive to a determination that the requested host name corresponds to a location-based service, return an IP address of a host of the requested host name located within the same building structure as the mobile client based on the client's location.

This aspect of the claimed invention is beneficial, because it allows clients to request services without having to pre-identify particular service entities. When a client makes a DNS request for a location-based service, an IP address associated with a host located within the same building

structure as the mobile client is returned. Using such a system, a mobile user can transparently access local services while moving around without needing to know in advance about specific service entities. Independent claim 14 recites similar limitations in method form.

The cited references do not teach or suggest the claimed features. For example, none of the references discloses a proxy configured to receive a DNS request specifying a host name from a mobile client. Examiner admits that this element is not disclosed or suggested by Stewart. (Office Action, paragraph 2), and neither is it taught by Calvert or Ramamurthy. Calvert describes a communication system for providing product information to requesting users. Although requests by mobile users are disclosed, they are described generically, through the statement: "the user enters a request for the product into the communication device…The request preferably indicates a product type." (7:35-7:38) No reference is made to the specific form of the request, which could comprise any number of possibilities, for example, a search request, a selection of a product type from a menu, or a combination of user inputs. The disclosure or suggestion of a proxy configured to receive a DNS request as specifically claimed is not present in the reference. Nor does Calvert disclose this limitation in method form.

Ramamurthy does not supply the missing element. Ramamurthy describes Local Area Network (LAN) communications according to an Asynchronous Transfer Mode (ATM) protocol. Although Ramamurthy discloses requests from mobile users, these requests are made in an entirely different operational context than the claimed invention. In Ramamurthy, the requests are made in a LAN environment, in contrast to the DNS/TCP-IP environment of the present invention. Accordingly, while Ramamurthy describes a request that includes the MAC address of a destination device (11:40-43), this is distinctly different than the "DNS request…specifying a host name" of the claimed invention.

In addition, the references fail to disclose or suggest a location-aware proxy that can "return an IP address associated with the host name and a service entity located within the same building structure as the mobile client based on the client's location," another recited feature. To meet this limitation, the Examiner asserts that it would have been obvious to one of skill in the art to combine the teachings of Ramamurthy, Calvert, and Stewart in order to serve multiple local clients located in the same building at the same time.

As an initial matter, this proposed combination would fall short because, as explained above, none of the references suggest or disclose a host name specified as part of a DNS request, much less returning an IP address associated with such a host name as claimed. In addition, however, the proposed combination is impermissible because it would render Calvert and Stewart unsatisfactory for their intended purpose.

The purpose of Calvert is to advertise multiple product providers in various locations to clients based on the location of the clients. (Abstract, 8:17-8:22) Similarly, the intended purpose of Stewart is to provide geographic-based advertising on behalf of service and information providers such as "car rental agencies, hotels, restaurants, airline reservation centers, banks, taxi services, bus and train reservation offices, printing services, on-line database services, message services, and E-mail providers." (6:50-6:53) Ramamurthy discloses clients and devices within the same building, and achieves this by coupling the elements to a common Local Area Network (LAN). Combining these references as the Examiner proposes would require the various geographically dispersed product and service providers of Stewart and Calvert to be coupled to the common LAN of Ramamurthy. However, modifying Stewart and Calvert in this way would undercut their objective of providing advertising on behalf of unaffiliated third parties because it would substantially limit advertising, to third parties sharing a common LAN. When, as here, a

proposed combination renders a reference unsatisfactory for its intended purpose, an obviousness rejection cannot be maintained. (MPEP 2143.01V)

Furthermore, Ramamurthy operates in a LAN context that differs substantially from the DNS- environments of the claimed invention. Thus, it cannot be easily adapted to work in a DNS-environment, with the cited or other potential references.

For at least the above reasons, Applicants respectfully submit that independent claims 1 and 14, and the claims which depend on them, are patentably distinct over the cited references. The other reference cited in the Office Action was cited for its disclosure of dependent limitations. Accordingly, this reference does not address the distinguishing elements discussed above.

On the basis of the above amendments, consideration of this application and the early allowance of all pending claims are requested. If the Examiner believes that direct contact with the Applicants' attorney will advance the prosecution of this case, the Examiner is encouraged to contact Applicants' representative as indicated below.

Respectfully submitted,
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